

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

SONY MUSIC ENTERTAINMENT, *et al.*,

Plaintiffs,

v.

COX COMMUNICATIONS, INC., *et al.*,

Defendants.

Case No. 1:18-cv-00950-LO-JFA

**DECLARATION OF CHIARA GENOVESE ON BEHALF OF THE UMG PLAINTIFFS
IN OPPOSITION TO DEFENDANTS' SECOND MOTION TO COMPEL**

I, Chiara Genovese, hereby declare, pursuant to 28 U.S.C. § 1746, as follows:

1. I am currently employed as Manager, Business and Legal Affairs, at Universal Music Group (the colloquial name given to the group of music-related companies owned by Vivendi S.A.). I have held that position or a similar position since August, 2018. I have personal knowledge of the facts set forth below and/or have learned of these facts as a result of my position and responsibilities at Universal Music Group. If called upon and sworn as a witness, I could and would testify competently as to the matters set forth herein.

2. I submit this declaration on behalf of Plaintiffs UMG Recordings, Inc. and Capitol Records, LLC (hereinafter, collectively, "UMG"). UMG and its record labels produce, market, sell, license, and otherwise exploit sound recordings and audiovisual works.

3. I understand that this declaration is to be submitted to the Court in connection with a motion to compel filed by Defendants Cox Communications, Inc. and CoxCom, LLC (collectively, "Defendants" or "Cox"). I also understand that Cox seeks documents and information concerning purported notices UMG has received pursuant to Sections 203 or 304 of

the Copyright Act (17 U.S.C. §§ 203, 304) related to UMG's United States copyright rights in certain sound recordings ("Notices").

4. [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.


Chiara Genovese

Executed this 8th day of July, 2019 in Santa Monica, California.